

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YIMIN HUANG, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

v.

SUNDIAL GROWERS INC., TORSTEN
KUENZLEN, JAMES KEOUGH, EDWARD
HELLARD, GREG MILLS, GREGORY
TURNBULL, LEE TAMKEE, ELIZABETH
CANNON, COWEN AND COMPANY, LLC,
BMO NESBITT BURNS INC.,
RBC DOMINION SECURITIES INC.,
BARCLAYS CAPITAL CANADA INC.,
CIBC WORLD MARKETS INC., and
SCOTIA CAPITAL INC.,

Defendants.

Case No. 1:19-cv-08913-ALC

CLASS ACTION

DANIEL GULACSY, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SUNDIAL GROWERS INC., TORSTEN
KUENZLEN, JAMES KEOUGH, EDWARD
HELLARD, GREG MILLS, GREGORY
TURNBULL, LEE TAMKEE, and
ELIZABETH CANNON,

Defendants.

Case No. 1:19-cv-10157-ALC

CLASS ACTION

**NOTICE OF MOTION AND MOTION OF RICARDO TRISTAN TO CONSOLIDATE
RELATED CASES, APPOINT LEAD PLAINTIFF AND APPROVE SELECTION OF
LEAD COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that class member Ricardo Tristan (the “Movant”) will and hereby does respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. §78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an Order: (1) consolidating the above-captioned actions (the “Related Actions”); (2) appointing Movant as Lead Plaintiff on behalf of all persons or entities who purchased or otherwise acquired the securities of Sundial Growers Inc. (“Sundial” or the “Company”) from July 28, 2019 through September 25, 2019, both dates inclusive; (3) approving Movant’s selection of the law firm of Hagens Berman Sobol Shapiro LLP (“Hagens Berman”) as Lead Counsel for the class; and (4) granting such other and further relief as the Court may deem just and proper.

This motion is based on the accompanying Memorandum of Law in support thereof, the Declaration of Reed R. Kathrein filed herewith and all exhibits attached thereto, the pleadings and other filings herein, and such other written and oral arguments as may be permitted by the Court.

WHEREFORE, Movant respectfully requests that the Court: (1) consolidate the Related Actions; (2) appoint Movant as Lead Plaintiff on behalf of all similarly situated Sundial investors; (3) approve Movant’s selection of Hagens Berman as Lead Counsel for the class; and (4) grant such other and further relief as the Court may deem just and proper.

DATED: November 25, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Jason A. Zweig
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Counsel for [Proposed] Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

/s/ Jason A. Zweig

JASON A. ZWEIG